

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**In the Matter of:**

**Daniel Benjamin Snyder  
SSN: XXX-XX-6318,  
  
DEBTOR.**

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**Case No.  
21-01942-DSC7**

**HEARING & ORAL  
ARGUMENT REQUESTED**

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**MOTION FOR RELIEF FROM AUTOMATIC STAY**

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Comes now **MARINA STEWART-MAGEE**, as Administrator and Personal Representative of the **ESTATE OF ALBINA AGDASOVNA SHARIFULLINA, deceased**, and respectfully moves this Honorable Court for relief from the automatic stay under 11 U.S.C. 362(d)(1). As grounds for said motion, the movant submits the following:

1. On August 18, 2021, the Debtor, Daniel Benjamin Snyder, filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code ("Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Alabama, Southern Division, Case No. 21-01942-DSC7. (Doc. 1).

2. The Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 1334, 157, and 11 U.S.C. § 362.

3. The Debtor has been sued as a defendant in a wrongful death civil case styled *Marina Stewart-Magee, as Administrator and Personal Representative of the Estate of Albina Sharifullina, deceased, v. Daniel B. Snyder*, Case No. 25-CV-2016-900001. The lawsuit is pending in the Circuit Court of Cullman County, Alabama and involves a fatal SeaDoo collision which occurred on Sunday, July 6, 2014 on Smith Lake in Cullman County, Alabama. Marina Stewart-Magee filed the lawsuit on behalf of the estate of her daughter, Albina Sharifullina, who died in

the collision.

4. Your movant request permission to lift the stay for the limited purpose of removal under 28 U.S.C. § 1334(b) and 1452(a).

**WHEREFORE, PREMISES CONSIDERED,** Marina Stewart-Magee respectfully requests this Honorable Court to enter an Order granting relief to the movant for the purpose of removing such case to federal court.

Respectfully submitted this 29th day of October, 2021.



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**CERTIFICATE OF SERVICE**

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I hereby certify that on this 29th day of October, 2021, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record in this case:

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